

**Air Pollution Control District
Jefferson County, Ky
8 February 2001**

TITLE V PERMIT SUMMARY

Company: Reynolds Metals Company- Louisville Foil Plant

Plant Location: 2827 Hale Avenue, Louisville, KY 40211-1260

Date App. Received: 22 April 1997

Date Admin. Complete: 20 June 1997

Date of Draft Permit: 10 December 2000

Date of Proposed Permit: 8 February 2001

District Engineer: John McCarthy

Permit #: 158-97-TV

Plant ID: 0186

SIC Code(s): 3353

NAICS: 331315

AFS: 00186

Introduction:

This permit is to be issued according to: (1) District Regulation 2.16, (2) Title 40 of the Code of Federal Regulations Part 70, and (3) Title V of the Clean Air Act Amendments of 1990. Its purpose is to identify and consolidate existing District and Federal air requirements and to provide practical methods of determining continued compliance with these requirements.

Jefferson County is classified as of the date above as an attainment area for lead (Pb), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), particulate matter (PM), and particulate matter less than 10 microns (PM₁₀); unclassifiable for particulate matter less than 2.5 microns (PM_{2.5}); and is a moderate non-attainment area for ozone.

Application Type/Permit Activity:

- ☒ Initial Issuance
- ☐ Permit Revision
 - ☐ Administrative
 - ☐ Minor
 - ☐ Significant
- ☐ Permit Renewal

Compliance Summary:

- ☒ Compliance certification signed
- ☐ Compliance schedule included
- ☐ Source is out of compliance

I. Source Description

1. **Class I Area Impacts:** This plant is not located in or near a Class I area.
2. **Product Description:** Aluminum Foil
3. **Overall Process Description:** Rolling and annealing rolls of aluminum until final product is achieved.
4. **Site Determination:** There are no other facilities which are contiguous or adjacent and under common control.
5. **Emission Unit Summary:**
 - U1: Aluminum Rolling Mills
 - U2: Oven Group
 - U3: Boiler Group using only natural gas as fuel
 - U4: Cold Solvent Cleaners consisting of five (5) non-halogenated part washers
 - U5: Degreasing Process - Products containing trichloroethylene are used to degrease or lubricate various pieces of equipment
 - U6: Core Paper Cyclone used to transfer waste core paper scrap from the slitters to a baler
 - U7: Storage Tanks
6. **Fugitive Sources:** The Company reported no fugitive sources.
7. **Title V Major Source Status by Pollutant:**

Pollutant	Actual Emissions (tpy) 1999 Data	Major Source Status Based on PTE*
CO	10.69	No
NO _x	6.1	No
SO ₂	Negligible	No
PM	0.96	No
VOC	937.4	Yes

Pollutant	Actual Emissions (tpy) 1999 Data	Major Source Status Based on PTE*
Single HAPs >1 tpy		
Trichloroethylene	4.05	No
Total HAPs	4.6	No

*Potential to Emit

8. **MACT Standards:** N/A

9. **Applicable Requirements:**

☐ PSD ☐ NSPS ☒ SIP ☐ Other
☐ NSR ☐ NESHAPS ☒ District-Origin ☐ MACT

II. Regulatory Analysis

1. **Emission and Operating Cap:** Reynolds is subject to an emission cap of 1,258 TPY for VOC from emission units U1 and U2.
2. **Compliance Status:** The source signed and submitted a Title V compliance certification in its Title V permit application.
3. **Operational Flexibility:** The source did not request to operate under alternative operating scenarios in its Title V Permit Application.
4. **Testing Requirements:** See Title V permit for any testing requirements.
5. **Monitoring, Record keeping and Reporting Requirements:** The source is required to monitor and maintain records of various operating parameters to demonstrate and report ongoing compliance with all applicable requirements, including those requirements addressing compliance with opacity standards. Compliance reporting is required semi-annually for VOCs emissions.

Opacity:

- (1) Emission Unit U6 - Weekly visible emissions surveys are required to monitor ongoing compliance with the opacity standard. The source is required to perform a Method 9 at points where visible emissions are observed. This emission unit has no history of compliance problems with the opacity standard. The periodic surveys coupled with Method 9 tests, if necessary, should reasonably assure the source's ongoing compliance with the opacity standard.

- (2) Emission Unit U3 - The District has determined that it is highly unlikely that emission units E-21, E-23, E-24 which combust natural gas only would violate the opacity standard; therefore, no periodic surveys or Method 9 tests is required. The company must perform monthly visible emissions survey for emission point E-22.

Particulate

- (1) Emission Unit U3 - The potential uncontrolled PM emissions, using the applicable AP-42 emission factors, demonstrate that the PM emission standards specified in District Regulation 6.07 cannot be exceeded, therefore, no periodic monitoring is required.
- (2) Emission Unit U6 - The potential uncontrolled PM emissions demonstrate that the PM emission standard specified in District Regulation 6.09 cannot be exceeded, therefore, no periodic monitoring is required.

Sulfur Dioxide

- (1) Emission Unit U3 - The potential uncontrolled SO₂ emissions, using the applicable AP-42 emission factors, demonstrate that the SO₂ emission standards specified in District Regulation 6.07 cannot be exceeded, therefore, no periodic monitoring is required.

VOC:

- (1) Emission Units U1 and U2 - Periodic monitoring for these emission units consists of daily record keeping of the amount of aluminum processed, hours of operation, and monthly rolling oil used, purchased, and reclaimed quarterly (prorated to a monthly basis). The company is required to calculate the total monthly VOC emissions and the daily average VOC emissions. The District has determined that the above monitoring and record keeping of raw material usage and production rates should reasonably assure ongoing compliance with the VOC limits. The potential uncontrolled VOC emissions from these emission units are below the emission standard; therefore no parametric monitoring for the mist eliminators is required.
- (2) Emission Unit U5 - Periodic monitoring for this emission unit consists of monthly usage records of cans of product containing trichloroethylene. Based on a maximum monthly usage of 700 cans of product, the emission limits can not be exceeded. The District has determined that the above recordkeeping is sufficient monitoring to reasonably assure ongoing compliance with the VOC limits.

- (3) **Emission Unit U4 -** The company is required to maintain records of each type of solvent used and perform monthly inspections to assure ongoing compliance with Regulations 6.18 and 7.18.
6. **Off-Permit Documents:** The District considers an “off-permit document” as a document on which a source’s compliance with given regulation(s) is contingent or which contains regulatory requirement(s), but is only referenced in a source’s Title V operating permit. The designation “off-permit document” shall be made at the District’s discretion, and may include, but not be limited to, documents such as Regulation 1.05 VOC compliance plans, Preventative Maintenance Program (PMP), Management Of Change System (MOCS); or other documents which are too voluminous to place in the permit.

There are no off-permit documents associated with the Reynolds Metals Title V permit.

III. Other Requirements

1. **Temporary Facilities:** The source did not request to operate any temporary facilities.
2. **Short Term Activities:** The source did not report any short term activities.
3. **Compliance Schedule/Progress Reports:** The source certified compliance with all applicable requirements; therefore, no compliance schedule or progress reports are necessary.
4. **Emissions Trading:** Reynolds has a banking permit on file, permit # 224-95-B, for Volatile Organic Compounds (VOCs). This emission reduction credit has been obtained by shutting down Rolling Mills 12, 13, 14, 22, 25, 26, 28, and 30; Laminators 2, 3, 5, and 13; by switching the rolling oil to a linear paraffin; and by discontinuing the use of hexane. The account balance is 1328.17 tons per year (8951.1 pounds per day). This balance includes 628.27 tons per year (4236.7 pounds per day) of pre-1990 credits and 699.90 tons per year of post-1990 credits (the pre-1990 credits are included in the total since these credits were included in the 1990 and the projected 1996 emissions inventories).
5. **Acid Rain Requirements:** The source is not subject to the Acid Rain Program.
6. **Stratospheric Ozone Protection Requirements:** Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any source that manufactures, sells, distributes, or otherwise uses any of the listed

chemicals. This source does not use any of the listed chemicals.

7. **Prevention of Accidental Releases 112(r):** The source does not manufacture, process, use, store, or otherwise handle one or more of the regulated substances, listed in 40 CFR Part 68 Subpart F and Regulation 5.15, Chemical Accident Prevention Provisions, in a quantity in excess of the corresponding specified threshold amount.
8. **Insignificant Activities:** The following activities identified in the Title V permit application have been determined by the District to be insignificant.

Insignificant Activities		
Description	Quantity	Basis
VOC Storage Tank, less than 250 gallons	Various	Regulation 2.02, Sec 2.3.24
Storage Tank, fuel or lubricating oils, vapor pressure < 10 mmHg at 20°C and 760 mm of Hg	12	Regulation 2.02, Sec 2.3.9.2
Combustion Sources < 10 MMBtu/hr	4	Regulation 2.02, Sec 2.1.1
Storage tanks - Diesel fuel - Not for sale, resale or distribution - annual turnover <2x capacity	1	Regulation 2.02, Sec 2.3.25
Woodworking, except for conveying, hogging or burning wood/sawdust	Various	Regulation 2.02, Sec 2.3.5
Indoor PM collectors venting indoors - Non 5.11, 5.12 or 5.14 regulated material	Various	Regulation 2.02, Sec 2.3.21
Lab Ventilating & Exhausting Systems, non-radioactive materials	Various	Regulation 2.02, Sec 2.3.11
Emergency Relief Vents or Ventilating Systems	Various	Regulation 2.02, Sec 2.3.10
Brazing, Soldering or Welding Equipment	Various	Regulation 2.02, Sec 2.3.4
Internal Combustion Engines, Fixed or Mobile	Various	Regulation 2.02, Sec 2.2
Research & Development (R&D) Activities, potential emissions less than 5 tons per year	1	Regulation 2.02, Sec 2.3.27
Dry trim cyclones*	2	See note

*Note: The separator trim cyclone carries trim that is approximately ½" wide x 3" long to a main collection point. This trim material does not meet the definition of particulate matter per District Regulation 1.02, and is therefore not a regulated pollutant.

1. Insignificant Activities are only those activities or processes falling into the general categories defined in District Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.
2. Activities identified In District Regulation 2.02, Section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the Title V permit.
 - a. No facility, having been designated as an insignificant activity, shall be exempt from any generally applicable requirement which shall include a 20% opacity limit for facilities not otherwise regulated.
 - b. No periodic monitoring shall be required for facilities designated as insignificant activities.